

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(FT. LAUDERDALE DIVISION)**

MONARCH AIR GROUP, LLC,  
a Florida limited liability company,

CASE NO.: 23-61256-CIV-JB

Plaintiff,

v.

JOURNALISM DEVELOPMENT  
NETWORK INC.

Defendant.

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**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE**  
**SUMMARY JUDGMENT DOCUMENTS UNDER SEAL**

Pursuant to S.D. Fla. Local Rule 5.4, the parties' Joint Motion for Entry of Stipulated Confidentiality Order [ECF No. 74-1], and the Court's Confidentiality Order [ECF No. 75], MONARCH AIR GROUP, LLC. ("Monarch") hereby moves for the entry of an order permitting Monarch to file unredacted versions of its forthcoming Motion for Summary Judgment, Statement of Material Facts, and supporting exhibits, under seal.

1. As provided by the Confidentiality Order, the parties have designated various portions of numerous depositions and other discovery materials, including particular documents and interrogatories, as "confidential" and/or "attorney's eyes only." [ECF Nos. 74-1, 75] These materials include, among other things, testimony and documents relating to the Defendant's internal operations, journalistic practices, financial information, and other relevant matters.

2. Monarch will be filing its Motion for Summary Judgment, Statement of Material Facts and supporting evidence by June 23, 2025, as required. [ECF No. 151] Monarch's summary judgment filings will cite and reference portions of testimony and materials designated as confidential or attorney's eyes only -- primarily by the Defendant. Given these confidentiality designations, Monarch is currently unable to include such information in a public filing under the Confidentiality Order.

3. To the extent that Monarch files or references materials that have been designated as confidential or attorney's eyes only, its publicly-available filings will redact only this information.

WHEREFORE, Plaintiff, MONARCH AIR GROUP, LLC. respectfully requests entry of an order permitting it to file unredacted versions of its Motion for Summary Judgment, Statement of Material Facts and specified supporting evidence under seal.

**CERTIFICATE OF CONFERRAL**

The undersigned attorneys hereby certify that they conferred with counsel for JDN through email prior to filing this Motion on June 9, 2025, and they represented that JDN does not oppose the relief requested herein.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was filed and served via the CM/ECF filer on June 10, 2025 to: Dana J. McElroy, [dmcelroy@tlolawfirm.com](mailto:dmcelroy@tlolawfirm.com); Thomas & LoCicero PL 915 Middle River Drive, Suite 309 Fort Lauderdale, FL 33304; James J. McGuire, Esq., [jmcguire@tlolawfirm.com](mailto:jmcguire@tlolawfirm.com); Daniela Abratt-Cohen, Esq., [dabratt@tlolawfirm.com](mailto:dabratt@tlolawfirm.com) ; Thomas & LoCicero PL 601 South Boulevard Tampa, FL 33606.

Respectfully submitted,

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